

KENNETH M. SUNBERG, P.C. (Atty. ID # 030451978)  
58 Vose Avenue  
South Orange, New Jersey 07079  
(973) 762-7868  
Kms@sunberglaw.com  
Attorney for Plaintiff Jesse Edwards Jr.  
File No.: 2905

2011 NOV - 9 A 10:19

FINANCIAL DIVISION  
REGISTRATION UNIT

JESSE EDWARDS, JR.,

*Plaintiff*

*vs*

STEVENS TRANSPORT INC., MICHAEL  
E. ARGUETA, and JOHN DOE a fictitious  
name,

*Defendants.*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - ESSEX COUNTY

DOCKET NO. L-8066-17

Civil Action

**COMPLAINT AND JURY DEMAND**

Plaintiff Jesse Edwards, Jr., 93-95 Tillinghast Street, in the City of Newark, County of Essex and State of New Jersey, complaining of the Defendants above, says:

**FIRST COUNT**

1. On or about November 17, 2015, Plaintiff Jesse Edwards, Jr., was the operator of a certain motor vehicle which was owned by Western Express, Inc., on a public highway, in Walton, County of Boone, and State of Kentucky.
2. At the aforementioned time and place, Defendant Stevens Transport, Inc., were the owner of a certain motor vehicle which was then and there being operated by their agent, servant or employment, Defendant Michael E. Argueta.
3. Defendant Michael E. Argueta, caused his vehicle to be operated by him in a careless, reckless and/or negligent manner causing his vehicle to strike that of the Plaintiff's.

4. As a result thereof, Plaintiff Jesse Edwards, Jr., sustained severe and grievous personal injuries for which he makes this claim.

**WHEREFORE**, Plaintiff Jesse Edwards, Jr., hereby demands judgment against Defendants Stevens Transport, Inc., and Michael E. Argueta, for personal injury damages together with interest and costs of suit.

**SECOND COUNT**

1. Plaintiff Jesse Edwards, Jr., repeats each and every allegation contained in the First Count of this Complaint as if same were fully set forth herein at length.

2. At the aforementioned time and place, Defendant JOHN DOE, a fictitious name, was the owner and/or lessor of a certain motor vehicle which was then and there being operated by their agent, servant, and/or employee, JOHN DOE.

3. Defendants JOHN DOE, a fictitious name, caused his vehicle to be operated in a careless, reckless, and/or negligent manner causing his vehicle to strike that of the Plaintiff's.

4. As a result thereof, Plaintiff Jesse Edwards, Jr., sustained severe and grievous personal injuries for which he makes this claim.

**WHEREFORE**, Plaintiff Jesse Edwards, Jr., hereby demands judgment against Defendant, JOHN DOE, a fictitious name, for personal injury damages together with interest and costs of suit.

KENNETH M. SUNBERG, P.C.  
Attorney for Plaintiff

  
KENNETH M. SUNBERG, ESQ.  
Attorney for Plaintiff

Date: November 7, 2017

JURY DEMAND

SUPERIOR COURT OF N.J.  
CIVIL DIVISION  
ESSEX VENIREAGE

Plaintiff herein demands a trial by jury as to all issues presented in the within matter.

KENNETH M. SUNBERG, P.C.  
Attorney for Plaintiff

Date: November 7, 2017

KENNETH M. SUNBERG, ESQ.  
Attorney for Plaintiff

CERTIFICATION

I hereby certify that this matter is not the subject of any other action pending in any Court or a pending Arbitration proceeding, nor is any other action or Arbitration contemplated. All parties known to plaintiff who should have been joined in this action, have been joined.

KENNETH M. SUNBERG, P.C.  
Attorney for Plaintiff

Date: November 7, 2017

KENNETH M. SUNBERG, ESQ.  
Attorney for Plaintiff

DESIGNATION OF TRIAL ATTORNEY

In accordance with R. 4:25-4, Kenneth M. Sunberg, Esq., is hereby designated as trial counsel for the Plaintiff(s) in the above referenced matter.

KENNETH M. SUNBERG, P.C.  
Attorney for Plaintiff

Date: November 7, 2017

KENNETH M. SUNBERG, ESQ.